



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

Draft Predecisional and Deliberative - for discussion purposes only

Reply To

Attn Of: ECO-087

Brigadier General Carl A. Strock
U. S. Army Division Engineer
Department of the Army
Northwestern Division of the Corps of Engineers
P.O. Box 2870
Portland, OR 97208-2870

Dear General Strock:

The U. S. Environmental Protection Agency (EPA) appreciates the strong working relationship and accomplishments we have established and developed with the Northwestern Division of the U.S. Army Corps of Engineers (Corps) under your leadership. Our respective staff and managers have been working together over the past year to develop a strategy for a Water Quality Plan for the Columbia and Snake River Mainstem. Our joint work efforts on the "2000 National Marine Fisheries Service (NMFS) Biological Opinion, Operation of the Federal Columbia River Power System," provide a national model for the integration of the Clean Water Act and Endangered Species Act. We are providing a letter to the Corps to clarify EPA's expectations on specific future work efforts and specific EPA and Corps commitments to aid these work efforts. This letter outlines the expectations and commitments of EPA in four specific areas: the Columbia Mainstem Total Maximum Daily Load, Engaging Other Snake River Managers, Augmented Temperature and Dissolved Gas Monitoring, and the Corps' forthcoming Record of Decision.

Columbia Mainstem Total Maximum Daily Load

As you know, the states of Idaho, Oregon, and Washington are working with EPA Region 10 in the development of Mainstem Total Maximum Daily Loads (TMDLs) for dissolved gas and water temperature. These TMDLs characterize the sources of total dissolved gas and temperature loadings and allocate those loadings to meet state and tribal water quality standards. We understand that the Corps has agreed to coordinate with EPA and the states on this TMDL effort. We are providing the following information to help define the TMDL coordination needs. (This information was included in the September 29, 2000, letter from Charles Findley, EPA, to Donna Darm, NMFS, stating comments on the Draft Biological Opinion.)

- The Corps, with the other Action Agencies (Bonneville Power Administration and Bureau of Reclamation), should commit to fully support the development and implementation of the Columbia and Snake River Mainstem dissolved gas and temperature Total Maximum Daily Loads (TMDLs) currently being developed by EPA and the states of Idaho, Oregon and Washington in coordination with the Columbia Basin Tribes. EPA's specific expectations include:
 - The Corps, with the other Action Agencies, should commit to share data and modeling to assist in the development of TMDLs.
 - The Corps should allocate sufficient funds to augment technical analyses necessary for TMDL development.
 - The Corps, with the other Action Agencies, should commit to develop, by December 31, 2001, a specific list and time schedule of both short and long term measures to reduce temperature in the Columbia and Lower Snake mainstem with the goal of achieving TMDL allocations. This time line is consistent with the current TMDL work effort .
 - The Corps, with the other Action Agencies, should commit to develop more detailed water quality improvement cost estimates for mainstem projects.

Engaging Other Snake River Managers

EPA temperature assessment studies have concluded that the Snake River is the Columbia River tributary with the most significant temperature impact on the Columbia River system. EPA, and States of Oregon, Washington, and Idaho, have made a major region-wide commitment to comprehensive watershed approaches in water quality improvement strategies throughout the Pacific Northwest. A comprehensive watershed approach should be applied to the development of the Columbia and Snake River Mainstem TMDL to understand the full possibilities of measures to reduce water temperature in the Snake River. EPA will commit, working with the States and Columbia Basin Tribes to convene a forum of other Snake River Managers (e.g. Idaho Power and Snake River water users) to identify some possible watershed approaches to improve Snake and Columbia River water temperature problems. The Corps, the Bureau of Reclamation and the Bonneville Power Administration should also plan to attend these meetings and coordinate on this effort. The Western Governors' Association has also indicated a willingness to assist in convening this forum in an effort to support the three states in the development of the Columbia/Snake Mainstem TMDL.

Augmented Temperature Monitoring

The Corps, with the other Action Agencies, should commit to develop and implement an augmented and more comprehensive monitoring program for the Columbia and Snake River mainstem for temperature. The need for improved temperature monitoring was a specific comment directed to EPA in the 1999 peer review of the EPA Columbia River Temperature Assessment. In response to the peer review, EPA has provided specific recommendations for augmented temperature monitoring in the attached paper, "An Outline of a Monitoring Program for Estimating the State of Water Temperature in the Columbia and Snake Rivers," prepared by

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EPA, April 25, 2001, and presented to the Water Quality Team on May 8, 2001. EPA will commit to work with the Corps in the development and review of this monitoring program.

Record of Decision

EPA appreciates the opportunity to work with the Corps staff and the other Action Agencies in the development of the water quality component of the Record of Decision that is due to be issued on May 17, 2001. We are confident that this joint work effort will lead to the development of adequate processes to develop measures for implementation of a water quality improvement strategy for the Columbia River. EPA will continue to work closely with the Corps and the other Action Agencies on the development of this strategy.

We hope this letter will be helpful as we continue to tackle the complex and challenging water quality improvement issues in the Columbia River system. These issues were discussed further at the meeting with Colonel Eric Mogren on May 9, 2001. If you need any additional information, please contact me directly at (206) 553-1234 or have your staff contact Mary Lou Soscia at (503) 326-5873.

Sincerely,

Charles E. Findley
Acting Regional Administrator

cc: Stephanie Hallock, Oregon Department of Environmental Quality
Tom Fitzsimmons, Washington Department of Ecology
Steve Allred, Idaho Department of Environmental Quality
Colonel Eric Mogren, U. S. Army Corps of Engineers
Ken Pedde, Bureau of Reclamation
Steve Wright, Bonneville Power Administration
Donna Darm, National Marine Fisheries Service
Bill Shake, Fish and Wildlife Service

Attachment

